UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Nikko D'Ambrosio, Plaintiff, v. **Abbigail Rajala, et al.**, Defendants.	**No. 1:24-cv-678** Judge Sunil R. Harjani

Motion to Join Defendant Meta Platforms, Inc.'s Motion for Extension of Time

Defendants Abbigail Rajala, Carol Rajala, and Rodney Rajala respectfully move to join Defendant Meta Platforms, Inc.'s motion for extension of time to respond to Plaintiff's Second Amended Complaint. *See* [56].

Plaintiff filed the Second Amended Complaint on October 11, 2024. *See* [53]. Responsive pleadings are currently due on November 1, 2024. *See* [54]. On October 22, 2024, Defendant Meta Platforms filed a motion to extend the deadline for responsive pleadings or motions to November 22, 2024. *See* [56]. Meta requests this extension due to the complexity of the Second Amended Complaint and to complete its legal and factual investigation. *See id.* at 6.

For the reasons articulated in Meta's motion, and for the sake of efficiency and to conserve resources, Defendants respectfully request to join Meta's motion to extend the due date for their responsive pleadings to the same date, November 22, 2024.

Additionally, Defendants' undersigned counsel is lead counsel in *United States v. Edson Resendez*, No. 1:22-cr-395-1 (Kness, J.), which is a death-eligible case. Counsel is currently in the midst of preparing for a mitigation presentation to the U.S. Department of Justice's Capital Review Committee, which requires travel to

and from Washington, D.C., on October 27–28. Due to the complexity and importance of that case, counsel's ability to respond to the Second Amended Complaint in this case by November 1, 2024, is extremely limited. An extension to November 22 will ensure that counsel has adequate time after the CRC presentation in *Resendez* to complete the responsive pleading in this matter.

Respectfully Submitted,

/s/ James G. Vanzant
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